

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Alejandro RODRIGUEZ-Rodriguez

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/03/2019 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 952 & 963

Offense Description

Knowingly and unlawfully import and conspire to import from a place outside the United States, to wit: the United Mexican States, to a place in the United States, to wit: Laredo, Texas, approximately 31.84 kilograms of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See Attachement "A"

☒ Continued on the attached sheet./s/ Gabriel Rios Jr*Complainant's signature*Gabriel Rios Jr, HSI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 11/05/2019*Judge's signature*City and state: Laredo, TexasSam Sheldon, US Magistrate Judge*Printed name and title*

Attachment A

I, Gabriel Rios Jr, a Special Agent with Homeland Security Investigations (HSI), have knowledge of the following facts:

1. On November 3, 2019, at approximately 10:41 a.m., defendant Alejandro RODRIGUEZ-Rodriguez, entered the United States via the Lincoln-Juarez International Bridge II in Laredo, Texas, operating a motor vehicle.
2. During the primary and secondary inspections, Customs and Border Protection Officers (CBPOs) obtained a negative oral declaration for prohibited items.
3. CBPOs discovered non-factory metal compartments within the vehicle's four wheels containing a total of twenty-six (26) packages of a white powder like substance that field tested positive for cocaine. The total weight of the narcotic was approximately thirty-one point eighty-four (31.84) kilograms.
4. On November 3, 2019, RODRIGUEZ-Rodriguez was advised of his Miranda Rights in the Spanish language. RODRIGUEZ-Rodriguez signed a Waiver of Rights form and agreed to make a statement without an attorney present.
5. RODRIGUEZ-Rodriguez stated he was the registered owner of the vehicle and was traveling from Monterrey, Nuevo Leon, Mexico to San Marcos, Texas to shop.